

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF
COMMSCOPE'S MOTION TO EXCLUDE CERTAIN
UNRELIABLE OPINIONS OF PLAINTIFF'S EXPERT DR. VIJAY MADISETTI**

I, Andrew S. Ong, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the Rebuttal Expert Report of Vijay Madiseti, Ph.D., on Validity of the Asserted Claims of the Family 6 Patents (U.S. Patent Nos. 8,462,835; 8,594,162), dated November 18, 2022.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the Decision Granting Institution of *Inter Partes* Review entered in *Nokia of America Corp. v. TQ Delta, LLC*, No. IPR2022-00471 (PTAB Aug. 18, 2022).

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the Opening Expert Report of Bruce McNair on the Invalidity of the Asserted Claims of the Family 6 Patents (U.S. Patent Nos. 8,462,835; 8,594,162), dated August 29, 2022.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the December 1, 2022 deposition of Dr. Vijay Madiseti.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 14, 2022, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong